

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

:

- v. -

: INFORMATION

VICTOR GONZALEZ,

: ⁹
18 Cr. 19

Defendant.

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ORIGINAL

COUNT ONE

The United States Attorney charges:

1. From at least in or about 2014 to in or about June 2018, in the Southern District of New York and elsewhere, VICTOR GONZALEZ, the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, maintain, advertise, patronize, and solicit by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, to wit, GONZALEZ recruited, enticed, harbored, transported, provided, maintained, and advertised three individuals who were less than 18 years old ("Minor Victim-1," "Minor Victim-2," and "Minor Victim-3"), who

were then caused to engage in at least one commercial sex act that benefitted GONZALEZ financially.

(Title 18, United States Code, Section 1591(a) and (b)(2).)

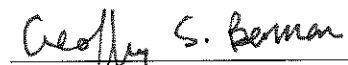
COUNT TWO

The United States Attorney further charges:

2. In or about January 2016, in the Southern District of New York and elsewhere, VICTOR GONZALEZ, the defendant, unlawfully, willfully and knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, which visual depiction was produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, to wit, VICTOR GONZALEZ, the defendant, engaged in sexual intercourse in

Westchester County, New York, with a 16-year-old girl for the purpose of producing a video of the sexual intercourse.

(Title 18, United States Code, Sections 2251(a) and (e).)

Handwritten signature of Geoffrey S. Berman in black ink.

GEOFFREY S. BERMAN

United States Attorney

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(18 U.S.C. §§ 1591(a) and (b)(2);
2251(a) and (e).)

GEOFFREY S. BERMAN
United States Attorney.
